

Clerk, U.S. District Court  
District Of Montana  
Great Falls

Affidavit & Motion of Default

~~\_\_\_\_\_~~

Dated this 7<sup>th</sup> day of December, 2022  
(date) (month) (year)

KG. 7h  
Your Signature

Arrest & Motion of  
11 Feb 1964 Detain

I hereby certify that a true and correct copy of the [redacted] Motion was served upon the opposing party (ies) on the 21 day of December, 2022 by the method and at the address as indicated below:

US District Court

125 Central Ave West  
Great Falls Mt 59404  
City/State/Zip Code

[ ] U.S. Mail, first class postage prepaid

☒ Hand Delivery

DATED this 21 day of December, 20 22

*Your Signature*

UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT

Form 27. Motion for Default of Defendant

Instructions for this form: <http://www.ca9.uscourts.gov/forms/form27instructions.pdf>

9th Cir. Case Number(s)

Case Name Flynn v Pabst

Lower Court or Agency Case Number 22 98 WR BMM

What is your name? Kenneth J Flynn

1. What do you want the court to do?

Acknowledge Default of Defendant Felton Flynn

2. Why should the court do this? Be specific. Include all relevant facts and law that would persuade the court to grant your request. (Attach additional pages as necessary. Your motion may not be longer than 20 pages.)

Defendant Felton Flynn appointed Conservator in Fraudulent Guardianship, failed to respond to the Amended Complaint, failed to defend her self from false statements, & Embarrassment Claim by plaintiff/allowed by CD-21-126 Guardianship Case!

Your mailing address:

PO Box 232 / 615 14 Ave

City Gulfport State MT Zip Code 59525

~~Prisoner Inmate Number (if applicable)~~ N/A

Name K J Flynn Date 12-21-2022

NAME: Kenneth Flynn  
MAILING ADDRESS: P.O. Box 232 / 615 1st AVE  
(Street or P.O. Box)  
Goulds Fork MT 59525  
(City/State/Zip Code)  
PHONE NUMBER: 202-714-3428

MONTANA 9<sup>(Dist)</sup> US Federal COURT, Cascade COUNTY

Kenneth Flynn  
Petitioner/Plaintiff,  
Pabst ET AL and  
Fallon Flynn  
Respondent/Defendant.

Cause No.: 22-98-GK-BMM

AFFIDAVIT

I, Kenneth Jay Flynn, hereby state as follows:  
(PRINT your name)  
Fallon Flynn Defendant has failed to  
respond to the Complaint or Amended  
Complaint. She has failed to ~~address~~  
address injuries caused to plaintiff for  
defamation of character, false claims &  
Embezzlement. She was served on  
December 3rd 2022 by TS McDermott Sheriff  
Served by Loren Hochhalter Deputy

A Copy of Service is Included

Requesting Default Judgment  
for 1<sup>st</sup> 10<sup>th</sup> of Claim 1.5 million

I DECLARE UNDER PENALTY OF PERJURY AND UNDER THE LAWS OF THE  
STATE OF MONTANA THAT ALL STATEMENTS AND INFORMATION  
CONTAINED IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT.

DATED this 21 day of December, 2022  
(day) (month) (year)

Kenneth J. Flynn  
YOUR SIGNATURE

Kenneth J. Flynn  
PRINT YOUR NAME

## SHERIFF'S RETURN OF SERVICE

STATE OF MONTANA,        }  
                                  } ss.  
COUNTY OF MISSOULA     }

OFFICE OF THE SHERIFF  
Case No. CV-22-98-GF-BMM

I hereby certify,

That I received the within summons on the 1st day of November, in the year 2022. That I personally served the summons on 3rd day of November 2022, upon Shirley Foust, upon Fallon Sahara Flynn, and upon Kirstin Pabst the defendants named therein, by delivering a copy of the Summons to each of them personally, in the County of Missoula.

That I personally served the summons on 4th day of November 2022, upon Dr Christopher Jons, upon Jason Mark, upon Jeff Wilson and upon Holly M. Mohorococh by serving her counsel, Martin S King, defendants named therein, by delivering a copy of the Summons to each of them personally, in the County of Missoula.

That I personally served the summons on 9<sup>th</sup> day of November 2022, upon Calvin Christianson, the defendant named therein, by delivering a copy of the Summons to the defendant, personally, in the County of Missoula.

That at the time when I served the summons upon the defendants, and at the same place I also served upon the defendants a copy of the complaint upon which the summons was issued by delivering a copy to the defendants personally.

TJ McDermott, Sheriff

Served by Loren Hochhalter, Deputy

FLAT FEES \$800.00

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the  
District of Montana

Kenneth J Flynn

Plaintiff(s)

v.

Calvin T Christman, Judge Jason Marks,  
Holly M Moharovich (Et Al)

Defendant(s)

Civil Action No. CV-22-98-61-BMM

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

fallon Flynn Missoula County Detention Center Missoula, MT  
address 2340 Millan Road, previous homes, 1010 West Pine, 615 12th AVE Gilford Mt 59525

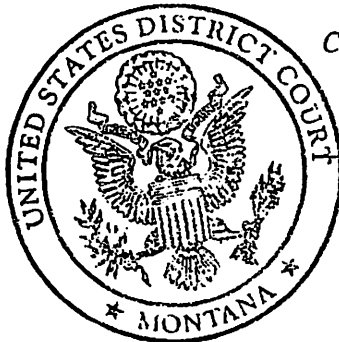
A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Kenneth J Flynn 615 12th AVE po Box 232 Gilford Mt 59525

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Date: OCT 31 2022



CLERK OF COURT **TYLER P. GILMAN**

[Signature]  
Signature of Clerk or Deputy Clerk